

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	
JOSHUA D. SPRINGER,	)	Criminal No. 20-65
	)	
Defendant.	)	Electronically Filed

**MOTION TO CONDUCT CHANGE OF PLEA HEARING BY VIDEOCONFERENCE**

Defendant, Joshua D. Springer, through his attorney, Martin A. Dietz, Esquire, files the within Motion to Conduct Change of Plea Hearing By Videoconference and respectfully states as follows:

1. The parties have reached a plea agreement in this case and Defendant requests that the Change of Plea Hearing proceed in this case via videoconference.
2. Defendant has been advised of and understands his right to be physically present at his Change of Plea Hearing and he is aware of this Court's Orders suspending and limiting certain court appearances due to the COVID-19 crisis. He, therefore, requests his Change of Plea Hearing be conducted via video pursuant to, and consistent with, the provisions contained in the CARES Act Administrative Order entered in this District on March 30, 2020 at No. 2:20-mc-466-MRH and the Administrative Order entered in this District on May 29, 2020 at Misc. No. 2:20-mc-394-MRH.
3. Under these circumstances, Defendant hereby waives his right to be physically present at his Change of Plea hearing and requests leave to participate in this hearing, along with his counsel, via videoconference so that it might be expeditiously concluded.

4. Counsel has discussed this matter with Defendant, who has given his consent to conduct the Change of Plea Hearing by videoconference and Assistant United States Attorney Lee Karl does not oppose this request.

5. The Defendant and his counsel represent that the Change of Plea Hearing in this case cannot be further delayed without serious harm to the interests of justice, more specifically because Defendant asserts his rights to a speedy trial and/or disposition of this matter. Further delays in this matter could have a significant impact on the Defendant's ability to maintain gainful employment and provide for his family. Moreover, to the extent that Defendant may require, further delay of these proceedings could deprive Defendant the opportunity to avail himself of any programs offered by the federal criminal justice system that would benefit him.

6. Accordingly, justice so requires that the Change of Plea Hearing proceed in this matter in the format requested above.

WHEREFORE, the Defendant, Joshua D. Springer, respectfully requests that this Honorable Court enter the attached proposed order permitting the Change of Plea Hearing to be conducted via videoconference pursuant to this Court's CARES Act Administrative Order entered at Misc. No. 2:20-mc-466-MRH for the reasons set forth in this Motion. *See also*, Misc. No. 2:20-mc-394-MRH.

Respectfully submitted,

s/ Martin A. Dietz .  
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